The Aviation Rulemaking Advisory Committee; Air Carrier and General Aviation Maintenance Issues (ARAC) is working to evaluate the current requirements of quality assurance programs for aeronautical repair stations and making recommendations whether the FAA should include such systems in the regulations. In order to better account for industry's opinions on this subject and collect factual data, the ARAC is soliciting industry input. Specifically, you are requested to address two of the subtasks from the FAA that the ARAC has accepted as are summarized below. These are:

Attachment 9

Subtask: Identify various options for regulating quality assurance programs and the advantages and disadvantages of each option. The ARAC has already determined that it will evaluate three options and that there are four elements to be considered as shown in the matrix. Please address each element for each option. There is also a "Prefer" column to indicate your preferred option for addressing quality assurance in the repair station industry.
Subtask: Provide information on the economic impact of applying the various options to the different segments of the repair station industry.

The data and costs provided by individual respondents will be accumulated into the overall estimates summarized by the ARAC and provided to the FAA. Individual information will not be made available to the FAA.

Instruction Information for Completing the Matrix: For the purposes of the cost-benefit analysis for the ARAC's technical report it is assumed that the entire regulatory quality system will be audited once a year. Additionally, please assume the corrective action that will be required by new section 145.211(c)(ix) will be incorporated into the quality assurance elements listing in the matrix, if it is found during an audit.

I. The cost and benefits portion of the matrix can be filled out in 2 ways:
(1) Generically, by providing information on how such cost and benefits will depend on size, location, and complexity of the operation; or,
(2) Specifically, by being as detailed as possible. At a minimum detalied cost estimates should include the manhours and type of personnel need to perform each of the functions required to accomplish (a)-(h) below.

In either case, please consider all the cost elements including, but not limited to:

(a) Developing a compliance document for the Repair Station Manual that incorporates each of the four "quality assurance" elements.
(b) Development of the auditor training and job requirements. Note: this may be a part time use of an existing employee.
(c) Training, as necessary, the auditor(s).
(d) Development of the audit checklist for the individual repair station.
(e) Developing a system to track findings and follow-up. This may include a computer or use thereof.
(f) Estimating the time necessary to perform the audits and follow up.
(g) Developing and maintaining the audit report for management
(h) Estimating the time to prepare and conduct a management review of the quality system

II. For respondents without maintenance facilities, it is important that you estimate the savings that you expect to receive by implementation of the Quality Assurance elements at a repair station vendor.

III. In the "Prefer" column indicate the order of preference for each option. "1" is most favored and "4" is least favored.

Indicate whether respondent is a repair station □; air carrier □; or "Part 91" entity □; or specify_____.
Indicate maintenance shop population, if applicable_____.

Option 1	**Prefer**	**Pro**	**Con**	**Economic Impact.** Include both initial cost for implementation and annual cost. If you currently have a similar system, use that for your cost basis.	
				Costs in manhours plus any fixed costs	**Savings**
Require all repair stations to include the 4 QA elements in their quality systems under Part 145		Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Initial Manhours of: Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cost Recurring (Annual) Manhours Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cos t	

Option 2	Prefer	Pro	Con	**Economic Impact.** Include both initial cost for implementation and annual cost. If you currently have a similar system, use that for your cost basis.	
				Costs in manhours plus any fixed costs	**Savings**
Regulate only those repair stations working for a 121/125/129/135 with a continuous airworthiness maintenance program		Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Initial Manhours of: Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cost Recurring (Annual) Manhours of Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cost	

Option 3	Prefer	Pro	Con	**Economic Impact.** Include both initial cost for implementation and annual cost. If you currently have a similar system, use that for your cost basis.	
				Costs in manhours plus any fixed costs	**Savings**
No regulations, voluntary only		Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Audit of quality system Root Cause Analysis of Findings Corrective Action/Follow-up Management Review	Initial Manhours of: Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cost Recurring (Annual) Manhours of Hourly ____ Supervisory/ Admin _____ Management ____ Material/system Cost	
Do you current have a system that substantially meets includes the Quality Elements described above for other reasons, such as JAA or other regulatory agency requirement, industry requirement or as a best practice? Yes ☐ No ☐					